

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

*Plaintiffs,*

v.

ANTHROPIC PBC,

*Defendant.*

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair Newbern

**DEFENDANT ANTHROPIC PBC'S  
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND  
IMPROPER VENUE OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendant, Anthropic PBC (“Anthropic”), through counsel, hereby moves the Court to dismiss the Complaint against it pursuant to Federal Rules of Civil Procedure 12(b)(2) or 12(b)(3). In support of this motion, Anthropic relies upon its Memorandum of Law and the Declaration of Jared Kaplan (and associated exhibits), which are being filed contemporaneously herewith.

Dated: November 22, 2023

Respectfully submitted,

**NEAL & HARWELL, PLC**

/s/ Aubrey B. Harwell III

Aubrey B. Harwell III (No. 017394)

Nathan C. Sanders (No. 033520)

Olivia Rose Arboneaux (No. 040225)

1201 Demonbreun Street, Suite 1000

Nashville, TN 37203

Telephone: (615) 244-1713

trey@nealharwell.com

nsanders@nealharwell.com

oarbhoneaux@nealharwell.com

Joseph R. Wetzel (*admitted pro hac vice*)  
Andrew M. Gass (*admitted pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (415) 391-0600  
joe.wetzel@lw.com  
andrew.gass@lw.com

Allison L. Stillman (*admitted pro hac vice*)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020-1345  
Telephone: (212) 906-1200  
alli.stillman@lw.com

Sarang V. Damle (*admitted pro hac vice*)  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, D.C. 20004  
Telephone: (202) 637-2200  
sy.damle@lw.com

*Attorneys for Defendant Anthropic PBC*

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

### **COUNSEL FOR PLAINTIFFS**

Steven A. Riley (No. 6258)  
Tim Harvey (No. 21509)  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, TN 37203  
(615) 320-3700  
sriley@rjfirm.com  
tharvey@rjfirm.com

Matthew J. Oppenheim  
Nicholas C. Hailey  
Audrey Adu-Appiah  
OPPENHEIM + ZEBRAK, LLP  
4530 Wisconsin Ave. NW, 5th Floor  
Washington, DC 20016  
Telephone: (202) 480-2999  
matt@oandzlaw.com  
nick@oandzlaw.com  
aadu-appiah@oandzlaw.com

Richard S. Mandel  
Jonathan Z. King  
Richard Dannay  
COWAN, LIEBOWITZ & LATMAN, P.C.  
114 West 47th Street, Suite 2100  
New York, NY 10036-1525  
Telephone: (212) 790-9200  
rsm@cjl.com  
jzk@cjl.com  
rxd@cjl.com

Jennifer Pariser  
Andrew Guerra  
Timothy Chung  
OPPENHEIM + ZEBRAK, LLP  
461 5th Avenue, 19th Floor  
New York, NY 10017  
Telephone: (212) 951-1156  
jpariser@oandzlaw.com  
andrew@oandzlaw.com  
tchung@oandzlaw.com

/s/ Aubrey B. Harwell III  
Aubrey B. Harwell III